

April 8, 2008

Mr. Don Aragon  
Executive Director  
Wind River Environmental Quality Commission  
P.O. Box 217  
Fort Washakie, WY 82514

Subject: Review of EnCana Oil & Gas (USA) Inc. Public Participation Plan  
Voluntary Remediation Program – Pavillion Natural Gas Field, Fremont County, WY  
Tribal Pavillion 14-11, Tribal Pavillion 42-11, Tribal Pavillion 24-3

Dear Mr. Aragon:

At the request of the Wyoming Department of Environmental Quality (WDEQ), EnCana Oil and Gas (USA) Inc. (EnCana) has prepared this Public Participation Plan (PPP) for your review and comment. The PPP describes how interested parties may obtain information related to the subject Voluntary Remediation Program (VRP) sites. In addition, interested parties may participate in the process of addressing the subject sites.

Once you have had an opportunity to review the contents of this PPP, please submit any comments or questions you may have to the WDEQ office in Lander to the attention of Ms. Kathy Brown. The address for their office is:

Wyoming Department of Environmental Quality  
Lander Field Office  
510 Meadowview Drive  
Lander, Wyoming 82520

If you have any questions, please feel free to contact Ms. Kathy Brown at (307) 335-6949.

Sincerely,

Michael Larson  
Environmental Team Lead  
EnCana Oil & Gas (USA) Inc.

Cc: K. Brown, WDEQ  
S. Regan, EnCana  
C. Thunem, EnCana

**Public Participation Plan  
EnCana Oil & Gas (USA) Inc.  
Pavillion, Wyoming**

**Voluntary Remediation Program  
Natural Gas Well Locations**

**Tribal Pavillion 14-11  
Trial Pavillion 42-11  
Tribal Pavillion 24-3**

Prepared by: EnCana Oil & Gas (USA) Inc.

Prepared for: Wyoming Department of Environmental Quality and Interested Parties

Date: April 8, 2008

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## **1.0 INTRODUCTION**

EnCana Oil & Gas (USA) Inc. (EnCana), is submitting this Public Participation Plan (PPP) to the Wyoming Department of Environmental Quality (WDEQ) pursuant to Voluntary Remediation Plan (VRP) Rules and Regulations – Title 35, Chapter 11, Article 16 of the Wyoming Environmental Quality Act, W.S. § 35-11-1601 et.seq. (Act). The primary objective for developing this document is to allow the public the ability to participate in the VRP activities associated with three of EnCana's natural gas production locations that are enlisted in WDEQ's VRP program. These locations include: Tribal Pavillion 14-11, Tribal Pavillion 42-11, and Tribal Pavillion 24-3.

The PPP has been developed to provide background information on the VRP sites and to describe the recommended approach for communicating VRP-related activities to interested parties. The PPP provides a:

- Framework for community participation including voicing concerns, interests, and expectations for the VRP sites;
- Mechanism for dissemination of site information and for receiving public feedback; and
- Means for obtaining information related to planned site assessment and remediation activities.

## **2.0 SITE AND PROJECT HISTORY**

### **2.1 History of VRP Sites**

The Pavillion Natural Gas Field is located east and north of Pavillion, WY, approximately 15 miles west of Riverton, WY. The Pavillion area is characterized by a shallow water table aquifer with groundwater flow direction generally toward Five Mile Creek which runs west to east bisecting the Pavillion Field. Geologic features include thin unconsolidated alluvial and colluvial deposits of Quaternary age underlain by the weathered Wind River bedrock formation.

Figure 1 provides a map showing the location of the three VRP sites, including the surface ownership, adjacent neighbors, and nearby roads. Agricultural land use consists primarily of alfalfa and grazing land. EnCana has operated the three natural gas well locations since acquiring the facilities from Tom Brown, Inc. in 2004. Shell Oil, or other predecessors, drilled and operated these natural gas well locations with the following spud dates:

TP 14-11	November 9, 1955
TP 42-11	August 6, 1973
TP 24-3	October 27, 1965

Since EnCana's predecessors operated these well locations for many years prior to EnCana's acquisition, this period of operations history is not known; however, it is

believed that unlined pits were used for temporary storage of drilling fluids, produced water, and condensate. Currently, the three locations are actively producing natural gas.

## **2.2 Regulatory Background**

EnCana is participating in the VRP program, administered by the WDEQ, at these three locations because hydrocarbon impacts were discovered in groundwater. EnCana address hydrocarbon impacted soils in accordance with the Wyoming Oil and Gas Conservation Commission (WYOGCC) cleanup guidelines.

The current status of EnCana's VRP sites is summarized below:

1. VRP applications for the three locations were submitted and approved by WDEQ on September 7, 2005.
2. EnCana has completed the public notice and comment period which ended on February 10, 2008.
3. Initial site characterization activities were performed in 2007.
4. Preliminary Remediation Agreement (PRA) between EnCana and the WDEQ was submitted to WDEQ on February 25, 2008 and became effective on March 7, 2008.

Anticipated VRP-related activities for each of the three VRP locations include:

1. Conduct continued site characterization activities;
2. Complete a report on site characterization results;
3. Evaluate remediation alternatives;
4. Complete remedy agreements;
5. Implement remedies;
6. Confirm that cleanup objectives have been met; and
7. Obtain certificate of completions.

This PPP includes:

1. A schedule for anticipated VRP-related activities for each site.
2. A commitment to provide the public with all soil and groundwater data.
3. A location in Fremont County where documents will be made accessible to the public.
4. A description of how the data will be made available in electronic form to the public.
5. Contact information.

## **2.3 Site Investigation Activities**

The initial site investigation reports for each site have been submitted to WDEQ for review. These reports were entitled "Report of Groundwater Hydrocarbon Impacts and Pavillion Pit Remediation" dated September 10, 2007 with a follow-up report dated October 12, 2007. The following provides brief descriptions for each VRP location.

### **2.3.1 Tribal Pavillion 14-11 (API Number 049-013-06355)**

The Tribal Pavillion 14-11 is located in the SW1/4 SW1/4 of Section 11, Township 3N, Range 2E. The elevation of the drill pad is approximately 5360 ft. The nearest perennial stream is Fivemile Creek runs northwest to southeast at a distance of approximately one mile north of the TP 14-11. The residence of Mr. and Mrs. John Middelstadt is a few hundred yards to the west of the facility. Figure 1 shows the TP 14-11 site and surrounding features.

Site investigation activities conducted to date at the TP 14-11 have included drilling over thirty (30) pushprobe boreholes on a grid pattern to a depth of bedrock or below the water table. The estimated depth of groundwater on site is approximately 12 ft below ground surface. The range in total hydrocarbons detected in site soils during field monitoring was from 0 – 2000+ ppm. Discrete samples were also collected and submitted to Energy Laboratories for concentrations of hydrocarbons, metals, and salinity.

As part of the site investigation, five groundwater monitoring wells were also installed at this location due to the elevated levels of hydrocarbons in the soil – groundwater interface. The monitoring wells were installed near the west, north, east, and south borders as well as directly in the center of the location.

### **2.3.2 Tribal Pavillion 42-11 (API Number 49-013-20442)**

The Tribal Pavillion 42-11 is located in the SE1/4 NE 1/4 of Section 11, Township 3N, Range 2E. The elevation of the drill pad is approximately 5340 ft. The nearest perennial stream is Fivemile Creek runs northwest to southeast at a distance of approximately 0.25 mile northeast of the TP 42-11. The nearest residence of Mr. and Mrs. Jeffrey Locker is located approximately 0.5 mile east of the facility. Figure 1 shows the TP 42-11 site and surrounding features.

Site investigation activities conducted to date for the TP 42-11 have included drilling over twenty pushprobe boreholes on a grid pattern to a depth of bedrock or below the water table. The estimated depth of groundwater on site ranges from 13 – 14 ft. below ground surface. The range in total hydrocarbons detected during field monitoring was from 0 – 2000+ ppm. Discrete samples were also collected and submitted to Energy Laboratories for concentrations of hydrocarbons, metals, and salinity.

As part of the site investigation, three groundwater monitoring wells were installed at this location due to the elevated levels of hydrocarbons exhibited near the soil – groundwater interface. The monitoring wells were installed near the west, center, and east portions of the area where hydrocarbons were detected.

### **2.3.3 Tribal Pavillion 24-3 (API Number 49-013-06387)**

The Tribal Pavillion 24-3 is located in the SE1/4 SW 1/4 of Section 3, Township 3N, Range 2E. The elevation of the drill pad is approximately 5380 ft. The nearest perennial stream is Fivemile Creek runs northwest to southeast at a distance of approximately 0.3 mile northeast of the TP 24-3. The nearest residence of Ms. Zoeann Randall is located approximately 0.5 mile southeast of the facility. Figure 1 shows the TP 24-3 site and surrounding features.

Site investigation activities conducted to date for the TP 24-3 have included drilling 12 pushprobe boreholes on a grid pattern to a depth of up to 10 – 12 ft below ground surface. The depth of groundwater at this location is estimated to be about 10 ft. below ground surface. The range in total hydrocarbons detected during field monitoring was from 0 – 2000+ ppm. Discrete samples were also collected and submitted to Energy Laboratories for concentrations of hydrocarbons, metals, and salinity.

Three groundwater monitoring wells were also installed at this location due to the elevated levels of hydrocarbons exhibited near the soil – groundwater interface. The monitoring wells were installed near the west, center, and east portions of the area where hydrocarbons were detected.

### **3.0 INITIAL SITE CHARACTERIZATION RESULTS**

EnCana has submitted the initial Site Investigation Reports for the three VRP sites to WDEQ. Additional site investigation requirements will be based upon the WDEQ's review of the initial reports. Although the cause of the hydrocarbon impacts is believed to be similar for each of the three sites, the extent of impacts varies from site-to-site. Initial groundwater characterization results have shown localized hydrocarbon impacts in the vicinity of where the unlined pits were once located.

Site characterization results based on of existing data have shown the following:

- Hydrocarbon impacted soil in known source areas will be cleaned up to meet either WYOGCC cleanup criteria or VRP cleanup levels;
- Soil type (mainly loamy sands) and groundwater depth have been confirmed at each site by using pushprobe boreholes;
- There are no known hydrocarbon impacts to the only VRP site with an adjacent private water well (Tribal Pavillion 14-11); and
- Ecological receptors will be evaluated through the Ecological Risk Assessment per VRP Fact Sheets #14 and #19.

### **4.0 PLANNED ACTIVITIES AND PROJECT SCHEDULE**

The following presents a summary of project work completed and the proposed schedule for 2008 and early 2009. The project schedule applies to all three VRP sites. Changes in schedule are likely and may occur due to certain factors that influence completion of each VRP-related item. These changes will be communicated to WDEQ immediately and to the public through a quarterly newsletter beginning on July 1, 2008. The quarterly newsletter will also provide VRP site-by-site progress updates to all interested parties.

Item	Estimate of Completion Date
Conducted Public Participation Meeting -Pavillion Community Center	September 12, 2006
Initiated Site Assessment Work	February, 2007
Met with WDEQ several times to discuss VRP program *	Fall, 2007
Met with landowners and WDEQ to discuss groundwater results	December, 2007
Conducted Public Notice Period	December, 2007 – February, 2008
Submitted Preliminary Remediation Plan *	February 25, 2008
Submitted Public Participation Plan *	February 29, 2008
Completed Phase I Site Investigation Reports *	March 7, 2008
Public Review Period for Public Participation Plan	April 14 – May 14, 2008
WDEQ requests Additional Site Characterization Activities	Spring, 2008
Perform Additional Site Characterization Activities *	June 1 – August 1, 2008
Perform Field Activities to Address Impacted Soils *	June 1 – August 31, 2008
Prepare Phase II Site Investigation Report *	September 15, 2008
Submit Site Remedy Evaluation*	November 1, 2008
WDEQ Completes Draft Remedy Agreement	November 21, 2008
Conduct Public Notification Process of Remedy Agreement	November 21 – January 1, 2009
Final Remedy Agreement *	January 1, 2009
Implement Remedy Alternative	March - May, 2009

\* Denotes activity for review and approval by WDEQ

\*\* The public will have access to all data, correspondence, and documentation

The underlying goal of the VRP is to reach a remedy agreement between WDEQ and EnCana. This agreement establishes the agreed upon remedial option for each site with components including:

- Remedial action work plan
- Remedial action schedule
- Provisions for modifying the remedy agreement
- Any other provisions or terms necessary to support the remedy implementation

The process for developing final reports includes:

- Submittal of draft document for WDEQ review
- Modifying document based on WDEQ comments
- Finalization of the document

Wyoming Statute 35-11-1604(d) requires public notice prior to the WDEQ and EnCana entering into a remedy agreement. This process allows public review and comment on the proposed remedy agreement.



## **5.0 COMMUNITY PARTICIPATION**

EnCana has adhered to all of the VRP requirements for public notification. At least twenty individuals or groups notified WDEQ that they wished to be involved in the Public Participation Process. EnCana will continue to keep the public informed to meet or exceed the recommended VRP public awareness approach.

EnCana is committed to keep all interested public informed on all aspects of the VRP sites activities and progress. To keep the public up-to-date on progress, a quarterly newsletter will be mailed to all parties on the interested party list maintained by EnCana and WDEQ. In addition, an easily located file of all data, correspondence, and documentation will be maintained at the following locations:

- Riverton Library – 1330 West Park, Riverton, WY. 82501
- Central Wyoming Community College Library – 2660 Peck Avenue, Riverton, WY. 82501

Hard copies of reports can be made available to interested parties on a special request basis.

Attachment 1 provides the WDEQ and EnCana representatives contact list. Attachment 2 provides a list of all individuals and organizations that are currently on the Interested Parties Mailing List. The mailing list may be modified at any time by contacting Ms. April Woodward of EnCana at 307-857-4600.